

Exhibit 12



Daniel Szalkiewicz <daniel@lawdss.com>

Rule 11 Letter

1 message

Daniel Szalkiewicz <daniel@veridianlegal.com>
To: Ira W Heller <iwhelleresq@gmail.com>

Mon, Jun 30, 2025 at 1:28 PM

Please see attached.

Very Truly Yours,

Daniel S. Szalkiewicz, Esq.

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**2025.06.30 Rule 11 Letter.docx**

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June 30, 2025

Via E- Mail Only (iwhelleresq@gmail.com)

Ira Heller Law, LLC.
Attn: Ira Heller, Esq.
1317 Morris Avenue
Union, New Jersey 07083

Re: *John Doe v. Baila Sebrow*
United States District Court, District of New Jersey
Case No.: 2:21-cv-20706

Dear Mr. Heller,

Please accept this letter pursuant to Rule 11(c)(1) and (2) as it relates to your most recent filing on June 20, 2025 (DE 151). Demand is made that you immediately withdraw your motion as it is frivolous under Rule 11(b) for the following reasons:

On the Law

First, the time to object to a “Magistrate Judge’s determination of a non-dispositive matter” pursuant to Civil Rule 72.1(c)(1)(A), which also calls for the appeal to be made “within 14 days after the party has been served with a copy of the Magistrate Judge’s order...” The sanctions order was issued on May 24, 2023 (DE 56) and the deadline to object to the order was June 9, 2023. The deadlines to object were previously discussed in our letter to the court dated July 7, 2023 (DE 72).

Second, on October 20, 2023, you filed a motion for reconsideration before Judge Farbiarz and included a request to reconsider the sanctions order (DE 96). On November 6, 2023, we once again addressed the timeliness of your motion and the merits (DE 104). On April 10, 2024, Judge Farbiarz denied your motion without prejudice (DE 112).

On the Facts

While much of what you presented in your motion is incorrect, I will address only the irrefutable facts.

1. The sanctions order was not solely for you missing the initial conference on November 10, 2025. In fact, only of \$990 of the total \$10,670 amount due is attributable to the conference; the remaining is for Ms. Sebrow not attending the December 21, 2022 settlement conference.
2. Mr. Borenstein’s \$5,000 relates to the settlement conference, not initial conference.
3. Paragraph 6 is false. The letter that you reference in Exhibit 3 was uploaded on CEF on November 10, 2022 at 9:25 AM. Your email to me was sent on November 10, 2022 at 1:54 PM.
4. Exhibit 6 is an incorrect compilation of 2 exhibits. The first two pages is DE 19, but the services are from DE 25.



As of July 2, 2025

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There are multiple other misstatements of facts in your brief, 7 page document. Demand is hereby made that you immediately withdraw your motion with prejudice. If not, we will file a motion for sanctions and seek additional attorney fees.

Thank you.

Very Truly Yours,

Daniel Szalkiewicz